

**Hughes
Hubbard**

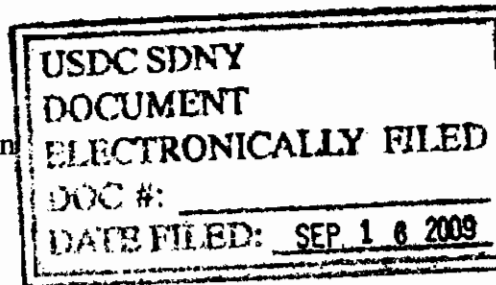
Hughes Hubbard & Reed LLP
One Battery Park Plaza
New York, New York 10004-1482
Telephone: 212-837-6000
Fax: 212-422-4726
hugheshubbard.com

September 14, 2009

Jeffrey R. Coleman
Direct Dial: 212-837-6555
coleman@hugheshubbard.com

BY HAND

Honorable Laura Taylor Swain
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 755
New York, NY 10007



MEMO ENDORSED

Re: Reino de España v. American Bureau of Shipping,
Et al. 03 Civ. 3573 (LTS) (RLE)

Dear Judge Swain:

Pursuant to the Court's request at the September 4, 2009 status conference in the above referenced action, the parties have conferred and have agreed to a briefing schedule with respect to the choice of law/dispositive motions the Court has authorized. Subject to the approval of the Court the parties have agreed and jointly request the following:

1. On November 24, 2009, the parties will serve by hand and file opening briefs, limited to forty five (45) pages.¹
2. On January 29, 2010, the parties will serve by hand and file opposition briefs, limited to twenty five (25) pages.
3. On March 1, 2010, the parties will serve by hand and file reply briefs, limited to fifteen (15) pages.

Counsel for Spain has reviewed this letter and agreed, as noted above, to the schedule proposed herein. The parties thank the Court for its attention to this matter.

The schedule and page limits are approved.

SO ORDERED.

NEW YORK, NY

[Signature] 9/16/09
LAURA TAYLOR SWAIN

Respectfully submitted,

[Signature]
Jeffrey R. Coleman

_____,² UNITED STATES DISTRICT JUDGE

¹ ABS's proposed 45 page brief is a consolidation of the two twenty five page briefs outlined in ABS's portions of the Pre-Hearing Order.

cc: Brian D. Starer, Esq. (by e-mail)
Juan A. Anduiza, Esq. (by e-mail)
Norman C. Kleinberg, Esq. (by e-mail)
John E. Grimmer, Esq. (by e-mail)